

### DOCUMENTING EKPC'S UNDERFREQUENCY RELAY OBLIGATIONS

An oversight occurred when EKPC integrated into PJM in 2013 such that the PJM Operating Agreement (OA), Schedule 7 provisions pertaining to Underfrequency Relay Obligations were not updated to include the applicable requirements for EKPC. Notwithstanding that oversight, PJM assessed EKPC's compliance with the SERC requirement, which is the appropriate requirement for EKPC. No reliability problems were created as a result of the oversight. At all times EKPC remained obligated to comply with SERC UFLS requirements.

The oversight in updating the OA, Schedule 7 upon EKPC's integration was further compounded by PJM's ministerial change to the definition of "PJM West Region" in 2018. As part of its Quality Assurance project, PJM worked with stakeholders to revise and clarify the definitions in its governing documents. The "PJM West Region" was revised to include specific reference to East Kentucky Power Cooperative. FERC approved those changes, and subsequent conforming manual changes highlighted to EKPC and PJM that including EKPC in the definition of "PJM West Region" had an unintended substantive effect of including EKPC in the provisions for the PJM West Region in OA, Schedule 7.

The ministerial changes to the governing document definitions were not intended to create or change substantive obligations for any member; no discussion of the potential implications of the PJM West Region definition change for the UFLS requirements was had during stakeholder deliberations or in the FERC docket.

EKPC is in the SERC region of NERC; the other entities included in the PJM West Region are within the ReliabilityFirst Region. The UFLS requirements differ slightly between the Regions. The current requirement for the PJM West Region is not the applicable requirement for EKPC.

To correct the oversight that occurred upon EKPC's integration, and to correct the confusion that resulted from the ministerial change to the PJM West Region definition, the PJM OA, Schedule 7 must be revised to include the appropriate UFLS requirement applicable for EKPC.

The necessary changes to the PJM OA, Schedule 7 does not require technical deliberations of the membership. The appropriate UFLS requirement applicable to EKPC has already been determined by SERC.